

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTERFOCUS INC., a California
Corporation,

Plaintiff,

v.

HIBOBI TECHNOLOGY LTD;
HANGZHOU HIBABY TECHNOLOGY
CO. LTD; HANGZHOU HAIBAOBEI
TECHNOLOGY CO., LTD; HANGZHOU
HIBAO TECHNOLOGY CO., LTD.; AND
HIBOBI HOLDINGS, LIMITED,

Defendants.

Case No.: 1:22-cv-02259

Hon. Steven C. Seeger

[PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

The Motion of Plaintiff INTERFOCUS, INC. (“Interfocus”) for a preliminary injunction against HIBOBI TECHNOLOGY LTD and HANGZHOU HIBABY TECHNOLOGY CO. LTD. (“Defendants”) having come on for hearing, this Court having reviewed the evidence and heard the arguments presented by the parties in support of and in opposition to said motion, the Court having previously granted a temporary restraining order in this action, being fully advised in the premises, and good cause appearing,

IT IS ORDERED as follows:

1. Plaintiff Interfocus’ motion for a preliminary injunction is granted;
2. Defendants, their affiliates, officers, agents, servants, employees, attorneys, parents, subsidiaries, and all persons acting for, with, by, through, under or in active concert with

them, are preliminarily enjoined and restrained during the pendency of this action or until further order of this Court from:

- a. reproducing, distributing copies of, making derivative works of, or publicly displaying the InterFocus's Copyrighted Images identified in the attached **Schedule A**, or any other images viewable on Plaintiff's website at <https://us.patpat.com/> in any manner without the express authorization of Plaintiff during the pendency of this action;
- b. passing off, inducing, or enabling others to sell or pass off any product bearing the InterFocus Designs as a genuine InterFocus Product that is not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for such sale;
- c. committing any acts calculated to cause consumers to believe that Defendants' Counterfeit InterFocus Products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
- d. further infringing the InterFocus Copyrighted Images and Designs, Plaintiff's other images at <https://us.patpat.com/>, and damaging Plaintiff's goodwill; and
- e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, using the InterFocus Copyrighted Images or any substantially similar derivative thereof;

3. The \$10,000 bond previously order by this Court in connection with the temporary restraining order entered herein shall remain in effect herein.

DATED: November __, 2022

Steven C. Seeger
United States District Judge

November 18 – Schedule A

Interface's Product Code	Copyright Registration or Application #	Copyright Certificate	Copyright Deposit Photos	Interfocus Website	Hibobi Website	# of Images Included
17237031	VA0002282656	Ex. 1A	Ex. 1B	Ex. 1C	Ex. 1D	2
17296179	VA0002266891	Ex. 2A	Ex. 2B	Ex. 2C	Ex. 2D	1
17296179	VAu001420322	Ex. 3A	Ex. 3B	Ex. 3C	Ex. 3D	4
17300843	VA0002282229	Ex. 4A	Ex. 4B		Ex. 4D	9
17272545	VA0002282931	Ex. 5A	Ex. 5B	Ex. 5C	Ex. 5D	3
17273247	VAu001404114	Ex. 7A	Ex. 7B	Ex. 7C	Ex. 7D	7
17260034	VA0002282229	Ex. 8A	Ex. 8B	Ex. 8C	Ex. 8D	1
17310814	VA0002259775	Ex. 9A	Ex. 9B		Ex. 9D	1
17310814	VA0002266425	Ex. 10A	Ex. 10B	Ex. 10C	Ex. 10D	1
17241548	VA0002289507	Ex. 11A	Ex. 11B		Ex. 11D	6
17240521	VA0002283332	Ex. 12A	Ex. 12B		Ex. 12D	5
17327020	VA0002267346	Ex. 13A	Ex. 13B	Ex. 13C	Ex. 13D	6
17314065	VA0002266770	Ex. 14A	Ex. 14B	Ex. 14C	Ex. 14D	10
17314069	VA0002262268	Ex. 15A	Ex. 15B	Ex. 15C	Ex. 15D	6
17314069	VA0002289508	Ex. 16A	Ex. 16B	Ex. 16C	Ex. 16D	4
17315607	VA0002261342	Ex. 17A	Ex. 17B	Ex. 17C	Ex. 17D	5
17320439	VA0002262261	Ex. 18A	Ex. 18B	Ex. 18C	Ex. 18D	4
17320439	VA0002289508	Ex. 19A	Ex. 19B	Ex. 19C	Ex. 19D	1
17326444	VA0002267269	Ex. 20A	Ex. 20B	Ex. 20C	Ex. 20D	4
17326444	VA0002289508	Ex. 21A	Ex. 21B	Ex. 21C	Ex. 21D	4
17330374	VA0002267274	Ex. 22A	Ex. 22B	Ex. 22C	Ex. 22D	6
17330374	VA0002289508	Ex. 23A	Ex. 23B	Ex. 23C	Ex. 23D	4
17348740	VA0002273862	Ex. 24A	Ex. 24B	Ex. 24C	Ex. 24D	6
17348740	VA0002289508	Ex. 25A	Ex. 25B	Ex. 25C	Ex. 25D	4
17353405	VA0002289508	Ex. 26A	Ex. 26B	Ex. 26C	Ex. 26D	10
17355466	VA0002289508	Ex. 27A	Ex. 27B	Ex. 27C	Ex. 27D	8
17362916	VA0002287366	Ex. 28A	Ex. 28B	Ex. 28C	Ex. 28D	6
17364687	VA0002283150	Ex. 29A	Ex. 29B	Ex. 29C	Ex. 29D	6
17366133	VA0002276650	Ex. 30A	Ex. 30B	Ex. 30C	Ex. 30D	4
17366133	VA0002289508	Ex. 31A	Ex. 31B	Ex. 31C	Ex. 31D	5
17372170	VA0002287498	Ex. 32A	Ex. 32B	Ex. 32C	Ex. 32D	4
17310049	VA0002266527	Ex. 33A	Ex. 33B	Ex. 33C	Ex. 33D	3
17310049	VA0002289508	Ex. 34A	Ex. 34B	Ex. 34C	Ex. 34D	3
17256792	VA0002289507	Ex. 35A	Ex. 35B	Ex. 35C	Ex. 35D	4
17258714	VA0002289507	Ex. 36A	Ex. 36B	Ex. 36C	Ex. 36D	1
17296789	VA0002267295	Ex. 37A	Ex. 37B	Ex. 37C	Ex. 37D	1
17271776	VAu001404200	Ex. 39A	Ex. 39B		Ex. 39D	1

Interface's Product Code	Copyright Registration or Application #	Copyright Certificate	Copyright Deposit Photos	Interfocus Website	Hibobi Website	# of Images Included
17310037	VA0002266527	Ex. 41A	Ex. 41B		Ex. 41D	2
17310037	VA0002289508	Ex. 42A	Ex. 42B		Ex. 42D	4
17250748	VA0002289507	Ex. 43A	Ex. 43B		Ex. 43D	5
17283410	VA0002282229	Ex. 44A	Ex. 44B		Ex. 44D	4
17359621	VA0002283150	Ex. 45A	Ex. 45B	Ex. 45C	Ex. 45D	4
17359621	VA0002283151	Ex. 46A	Ex. 46B	Ex. 46C	Ex. 46D	2
17371178	VA0002289520	Ex. 47A	Ex. 47B	Ex. 47C	Ex. 47D	6
17353392	VA0002307943	Ex. 48A	Ex. 48B		Ex. 48D	11
17324872	VA0002307943	Ex. 49A	Ex. 49B		Ex. 49D	11
17307611	VA0002266428	Ex. 50A	Ex. 50B		Ex. 50D	5
17306330	VA0002267609	Ex. 51A	Ex. 51B		Ex. 51D	6
17354127	VA0002283150	Ex. 52A	Ex. 52B		Ex. 52D	4
17354127	VA0002307943	Ex. 53A	Ex. 53B		Ex. 53D	3
17315604	VA0002261342	Ex. 54A	Ex. 54B		Ex. 54D	6
17315604	VA0002307943	Ex. 55A	Ex. 55B		Ex. 55D	5
17386320	VA0002282656	Ex. 56A	Ex. 56B		Ex. 56D	5
17360320	VAu001445206	Ex. 57A	Ex. 57B		Ex. 57D	4
17324834	VAu001439819	Ex. 58A	Ex. 58B		Ex. 58D	2
17359621	Case No. 1-11854677161		Ex. 59B	Ex. 59C	Ex. 59D	4
17371178	Case No. 1-11854677161		Ex. 60B	Ex. 60C	Ex. 60D	4
17366713	Case No. 1-11854677161		Ex. 61B	Ex. 61C	Ex. 61D	11
17353799	Case No. 1-11854677161		Ex. 62B		Ex. 62D	9
17324832	Case No. 1-11854677161		Ex. 63B		Ex. 63D	7
17361970	Case No. 1-11854677161		Ex. 64B		Ex. 64D	10
17273247	Case No. 1-11854677161		Ex. 65B	Ex. 65C	Ex. 65D	2
17386320	Case No. 1-11854677161		Ex. 66B		Ex. 66D	4
17283405	VAu001414303	Ex. 67A	Ex. 67B		Ex. 67D	1
17307471	VA0002267284	Ex. 68A	Ex. 68B		Ex. 68D	1
	VA0002255941	Ex. 69A	Ex. 69B	Ex. 69C	Ex. 69D	4
	VA0002261156	Ex. 70A	Ex. 70B	Ex. 70C	Ex. 70D	2
					TOTAL	308